

IN RE:  
JOSEPH L. ZOBAL

No.: 04-74937  
JUDGE BARBOSA  
Chapter 13

Debtor(s).

**RESPONSE TO NOTICE OF CURE OF ALL  
PREPETITION MORTGAGE OBLIGATION**

NOW COMES HOMECOMINGS FINANCIAL/GMAC ("Movant"), by and through its attorneys, BARBARA J. DUTTON and the law firm DUTTON & DUTTON, P.C., and in support of its RESPONSE, states as follows:

1. On 10/05/2004, the above captioned Chapter 13 bankruptcy was filed.
2. MOVANT is a creditor of the Debtor with respect to a mortgage secured by a lien upon the property commonly known as 1727 7TH AVENUE, BELVIDERE, IL, 61008.
3. Trustee has filed Notice indicating that all prepetition claims have been paid.
4. While Movant does not dispute that its claim has been satisfied, Movant hereby asserts that the loan is in default.
5. At present, the loan is due for the 09/10/04 monthly payment and those thereafter as well as \$346.00 in outstanding broker price opinions (BPOs).

Respectfully submitted,

HOMECOMINGS  
FINANCIAL/GMAC

/s/ Barbara J. Dutton, esq.

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